

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Fray Lynch	:	
	:	
v.	:	Civil Action No. 06-351-JJF
	:	
City of Wilmington	:	

PLAINTIFF'S PROPOSED VOIR DIRE AND
RESPONSE TO DEFENDANT'S PROPOSED VOIR DIRE

Plaintiff has no objection to the following proposed voir dire questions submitted by
Defendant: 1, 2, 3, 4, 5, 6, 7, 10, 12, 13, 14, 15, 17, 18, 19, 20 and 21.

Plaintiff proposes the following modifications to proposed voir dire questions Nos. 8, 9,
11 and 16 submitted by Defendant:

8. Do you know any of the following persons who may be called as witnesses at
trial?:

Monica Gonzalez-Gillespie
John Burns
Gregory Ciotti
Richard Armorer
Paris Armorer
Theodore Blunt
Romain L. Alexander
Dr. Anjala Pahwa
Cpl. Michael Groark
Sgt. Deborah Donohue
Capt. Nancy Dietz
Capt. Marlyn Dietz
Marcia Starks

9. Do you have any feelings or beliefs about sexual harassment cases in general that
would influence your decision in this case?

11. Have you or any member of your family ever made a claim or had a claim made
against you of sexual harassment or worked for a company that had a claim made against it of
sexual harassment or participated in any way in a sexual harassment case?

16. Have you or any member of your family ever been a plaintiff, a defendant, any other party or a witness in any civil or criminal case?

Plaintiff proposes the following additional voir dire questions:

- 22. Have you ever worked in any managerial or supervisory capacity?
- 23. Have you ever worked in any human resources or personnel capacity?
- 24. Do you have a background in investigations of any kind?